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28 29 Judge: Chapter: Marc Barreca

oter:

UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re:

No. 10-19817 - MLB

GROSSMAN, ADAM R.

EX PARTE APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF DENICE E. MOEWES AND WOOD & JONES, P.S. AS ATTORNEY FOR TRUSTEE

Debtor.

Ronald G. Brown, the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case, applies to this Court for authority to employ Denice E. Moewes and Wood & Jones, P.S. as the Attorney for Trustee and in support thereof states as follows:

- 1. On August 19, 2010, Adam R. Grossman filed a Chapter 11 bankruptcy petition in the United States Bankruptcy Court for the Western District of Washington at Seattle, and on December 22, 2010 Ronald G. Brown was appointed trustee of the estate. The case was converted to a Chapter 7 bankruptcy on March 11, 2011 and Ronald G. Brown was appointed Chapter 7 trustee on the same date.
- 2. The assets of the estate include the debtor's interests in several businesses and at least two parcels of real property and potential avoidance actions. The trustee desires to hire Denice E. Moewes and Wood & Jones, P.S. to represent the trustee on behalf of the estate on an hourly basis, subject to Court approval after notice and a hearing.
- 3. The trustee is aware of no connections between Denice E. Moewes Wood & Jones, P.S. and the debtor, creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee. No notice to creditors or interested parties of this motion is necessary pursuant to 11 U.S.C. §102(1) and FRBP 2002.

Wood & Jones, P.S. 303 N. 67th Street Seattle WA 98103 (206) 623-4382

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WHEREFORE, the trustee applies to the Court for an order authorizing the employment of 1 Denice E. Moewes and Wood & Jones, P.S. as Attorney for the Trustee to perform legal services 2 described in this application, with all compensation subject to Court order upon notice to creditors 3 and a hearing. 4 5 DATED: April 7, 2011. 6 7 /s/ Ronald G. Brown Ronald G. Brown, WSBA #8816 8 Chapter 7 Trustee 9 10 I CERTIFY under penalty of perjury that on Thursday, April 07, 2011, I caused a copy of 11 the foregoing document to be delivered to the U.S. Trustee by email to: 12 13 USTPRegion18.SE.ECF@usdoj.gov 14 15 /s/ Tess M. Kent Tess M. Kent 16 17 18 general - app to hire attorney 19 20 21 22 23 24 25 26 27 28 29 Wood & Jones, P.S. 303 N. 67th Street

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